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15 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
16 **SAN JOSE DIVISION**

17 JOSEPH TAYLOR, EDWARD MLAKAR,
18 MICK CLEARY, EUGENE ALVIS, and
JENNIFER NELSON, individually and on
behalf of all others similarly situated,

19 Plaintiffs,

20 v.

21 GOOGLE LLC,

22 Defendant.
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Case No. 5:20-cv-07956-VKD

**L.R. 6-2 STIPULATED REQUEST TO
EXTEND OMNIBUS MOTION TO
SEAL AND [PROPOSED] ORDER**

Judge: Hon. Virginia K. DeMarchi

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Pursuant to this Court’s Case Management Order (ECF No. 99) and Civil L.R. 6-2, Plaintiffs Joseph Taylor, Edward Mlakar, Mick Cleary, Eugene Alvis, and Jennifer Nelson (“Plaintiffs”) and Defendant Google LLC (“Google”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, the current deadline for Class Certification and Expert Challenges Replies is July 8, 2025 (ECF No. 189);

WHEREAS, the current deadline for Google’s Omnibus Motion to Seal materials filed in connection with Plaintiffs’ motion for class certification (including any opposition, reply, or other filings related to that motion) and any expert challenge motions filed on March 11, 2025 by either party (including any oppositions, replies, or other filings related to those motions) (collectively, the “Materials”) is May 21, 2025 (ECF No. 166);

WHEREAS, due to the changes in schedule for the Class Certification and Expert Challenges briefing, the current deadline for Google’s Omnibus Motion to Seal does not cover the Materials as ordered by the Court;

WHEREAS, the Parties have agreed to extend the deadline for Google’s Omnibus Motion to Seal from May 21, 2025 to July 16, 2025 in order to cover the Materials;

WHEREAS, the Parties have agreed to extend the deadline for Plaintiffs’ opposition to Google’s Omnibus Motion to Seal, if any, from July 9, 2025 to July 30, 2025;

WHEREAS, the Parties have agreed to extend a reply in support of Google’s Omnibus Motion to Seal, if any, from July 30, 2025 to August 20, 2025

WHEREAS, for the reasons set forth in the Declaration of Whitty Somvichian in Support of the L.R. 6.2 Stipulated Request for Order Extending Case Deadlines (attached hereto as Exhibit A), the Parties jointly agree that good cause exists to grant the extension of time, including because: (1) Google’s Omnibus Motion to Seal should cover the at issue Materials; (2) the Parties are actively litigating both this matter and the concurrent *Csupo v. Google LLC* matter in Superior Court in Santa Clara County, which raises materially the same claims at issue in this litigation, and which is set for trial on June 2, 2025; (3) the Parties have negotiated extensively regarding the issues driving this request and have made every effort to resolve any underlying disputes without

1 Court intervention; (4) the requested extensions will not impact the trial date set in this case; and
 2 (5) the requested extensions are in the interests of both Parties and the just and efficient progress
 3 of this matter, and are critical to the Parties' ability to present the most helpful briefing and
 4 presentations to this Court.

5 **NOW, THEREFORE**, the Parties, by and through their respective counsel, stipulate and
 6 agree that the following revisions should be made to the case schedule:

8 Event	Current Deadline	Stipulated Deadline
9 Omnibus Motion to Seal	May 21, 2025	July 16, 2025
11 Opposition to Omnibus Motion to 12 Seal, if any	July 9, 2025	July 30, 2025
13 Any reply in support of Omnibus 14 Motion to Seal	July 30, 2025	August 20, 2025

16 **IT IS SO STIPULATED.**

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 19 Dated: May 19, 2025

Respectfully submitted,

COOLEY LLP

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 22 By: /s/ Whitty Somvichian
 Whitty Somvichian

23 Attorney for Defendant
 24 GOOGLE LLC

1 Dated: May 19, 2025

KOREIN TILLERY LLC

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3 By: /s/ Chad E. Bell
4 Chad E. Bell

5 Attorney for Plaintiffs

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9 **ATTESTATION OF CONCURRENCE IN FILING**

10 Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, the undersigned hereby attests
11 that concurrence in the filing of this document has been obtained.

12 Dated: May 19, 2025

COOLEY LLP

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14 /s/ Whitty Somvichian
15 Whitty Somvichian

16 Attorneys for Defendant
17 GOOGLE LLC
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PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

The Honorable Virginia K. DeMarchi
United States District Judge